

EXHIBIT 17

SWORN STATEMENT OF COREY WOODWARD

1. My name is Corey Woodward. I am over the age of 21 and have personal knowledge of the contents of this statement.

2. I started working in the property department of CRC in March 2015 as an account executive working under Stewart Dunbar and John Cadden. As an account executive, I was assisting the brokers on my team with managing their accounts.

3. I worked in that role for about two years. The book of business I was working on was not doing well and had experienced a decrease in revenue. This impacted my pay, and I needed to seek other options.

4. I expressed to John Cadden my interest in transferring teams. He mentioned that Trey Reich in the Professional Liability Department was interviewing and looking to hire an associate broker for his team. Reich's specialty was architect and engineer policies. I had a masters in architecture and design and had worked as an architect for several years before joining CRC. It seemed like a good fit, and I ultimately joined Reich's team.

5. When someone is looking to fill a new position, it is common for the hiring broker to ask around the office if anyone knows potential candidates and for BB&T/Truist to post the position.

6. In my experience, the team you end up on is very important for determining your pay and career projection.

7. For the first year or so on Reich's team I was learning the business on the Professional Liability side. I was assisting Cathy Roussell, Reich's account executive and managing Reich's renewal book. I worked accounts start to finish to learn the business. Reich's team was small. For four years after I was hired it was just me, Roussell, and Reich.

8. After two or three years, I started working on building my own relationships with clients and getting accounts to build my own book. At that time, I was also still managing Reich's renewal book. As an associate broker, I was expected to travel and bring in business, but we could not hire anyone else until the team's revenue grew.

9. The team got approval to hire a new account executive in 2021 who helped everyone on the team.

10. I did not get handed any accounts. I had to build my own book. I wanted to get some revenue under my name. I noticed teams in the department were stressing over smaller revenue accounts which gave me an idea. I went to Rusty Hughes and asked if I could do a deep dive into each team's small accounts to see if it made business sense for the team to keep working on smaller accounts. Hughes allowed me access to that data, and I created a PowerPoint presentation for each team. I presented the idea to each team that I could take over their small revenue accounts so they could focus on larger revenue accounts.

11. I proposed that credit for the revenue would gradually shift to me from the team's brokers over 2-3 years. Not everyone was on board with my proposal. Team Daugherty partnered with me a little more than others. I would also sometimes get sent new small business that would come in. Kathryn Hendrix was the inside broker on Daugherty's team and was actively pushing for me to take on more of their team's smaller accounts. Only about 10 of Team Daugherty's accounts came to me, maybe \$10,000.00 in revenue. There were accounts Hendrix wanted me to take that didn't end up happening.

12. Hendrix expressed to me that while she was in audit she was getting a feel for where she might want to transfer to and chose Corey Daugherty's team. She said she wanted to be an

inside broker. She later told me the position was different than she had hoped for. Daugherty and Segrest wanted to be more involved in their accounts.

13. To build my book I was cold calling and visiting agents. Building a book ultimately depends on you and your initiative. This is a very self-driven business.

14. Our team today is still small and includes the lead broker, myself as associate broker, one inside broker, and one account executive.

15. I sat in a cubicle the first two years I was an associate broker. Another team needed my cubicle when they were hiring someone, and I was moved to a small, window-less office.

16. I got my picture taken and added to the website about 3 or 4 years ago. There is someone set up at the yearly broker retreat to take headshots if you want one, and that is where I had my picture taken.

17. The Professional Liability Department communicates through a department email list. Hughes expressed he wanted to make sure everyone was included on communications and that no one was mistakenly left off emails as the department grew. I do not recall him telling the department to only use that email list. It was a shift over time.

18. I sometimes communicated with other CRC employees by group text. This was typically used if a group was traveling together and needed to quickly get in touch with one another or coordinate. I am not aware of any group texts that share information about dinners or other business events.

19. Hendrix told me she didn't want to travel and develop business.


20. Hendrix was an unhappy person. There were many things I heard her complain about.

21. Hendrix complained to me that she felt excluded from events. Hendrix was on the same invitations I received, but I rarely saw her at events.

22. Hendrix expressed to me she believed Ron Helveston was conspiring against her because she dated his son in high school. Hendrix told me she thought Ron Helveston was the one holding her down.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 5/10/2024


COREY WOODWARD